

# Exhibit 3



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October 16, 2023

*VIA EMAIL*

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Counsel:

I write on behalf of Arab Bank, PLC (“Arab Bank” or the “Bank”) in response to the Court’s October 2, 2023 Minute Order (the “Minute Order”)

First, as to what Arab Bank “intends to do with respect to the production of documents for account holders who do not provide waivers,” as you know, the Bank is bound by the foreign bank secrecy laws of Jordan, Lebanon, and the Palestinian Territories. In an effort to produce documents in response to Plaintiffs’ request and the Court’s April 14, 2023 Production Order, and as I explained to Magistrate Judge Kuo, the Bank has been working tirelessly to obtain as many waivers as possible. That effort is ongoing, and we expect to continue to receive waivers and produce documents in the coming weeks. The Bank, however, cannot violate foreign bank secrecy laws, and therefore cannot produce documents for account holders who have not provided waivers. That said, the Bank believes that the parties should discuss this issue once the Bank has exhausted its efforts to obtain waivers.

Second, as to the “electronic sources of communications (including financial transactions) which were later printed and preserved in the regular course of business in paper format,” the Bank is working diligently to obtain this information and asks for a 72-hour extension of the Court’s October 16 deadline. We are compiling the information requested in the Court’s Minute Order and expect to have a substantive response to you by Thursday, October 19, 2023.



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Finally, we acknowledge the meet and confer request and list of topics received from Ms. Davies today. I suggest that once the Bank provides the information on October 19, the parties schedule a meet and confer for the week of October 30<sup>th</sup> to discuss issues related to both parties' document productions to date.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Brett Ingerman'.

Brett Ingerman